

**CableLabs,**

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Cable Television Laboratories, Inc

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February 3, 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Michael K. Powell  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Re: Competitive Status of Cable Modems: GN Docket No. 00-185,  
CS Docket 02-52, CS Docket 97-80.

Dear Mr. Chairman:

A recent Consumer Electronics Retailers Coalition filing of January 27, 2003 claims that CableLabs' testing regime creates barriers to entry and hurdles to innovation and competition. I am writing to correct CERC's misleading picture of the CableLabs certification process.

Since its launch in 1997, the CableLabs DOCSIS specification, certification and testing program has transformed an industry away from expensive, proprietary products into an open, highly-competitive cable modem market. DOCSIS is an international interface standard, available royalty-free to any interested manufacturer. As of Year-End 2002, 23-million DOCSIS products had shipped worldwide. Modem prices have declined from \$300 in 1998 to less than \$50 in 2003. Since 1999, CableLabs has certified or qualified over 350 cable high-speed Internet access devices, including 300 different modem models and 51 models of equipment designed for cable headends. Sixty-nine different manufacturers of DOCSIS products have successfully completed the CableLabs certification process.

I am proud to say that the CableLabs certification process is much swifter than Underwriters Lab's testing and approval process.<sup>1</sup> The certification procedures have been used for cable modems by virtually all the major CE manufacturers, including Motorola, Toshiba, Samsung, Pioneer, Panasonic, Thomson, Cisco, Matsushita, Sony and Philips, among others.

Such testing and certification has created a robust, competitive market and insured that new devices do not affect other traffic on the cable network, or harm the cable network itself. These certified devices also include multiple innovations beyond the baseline DOCSIS modem requirements, and contrary to CERC's claim, they include features such as wireless home network connections, routing, and firewall services.<sup>2</sup>

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<sup>1</sup> CERC complains that certification must be followed even for changes in color or housing. Paint and housing vanes in content (e.g., lead or titanium), which affects conductivity and RF emission. But CableLabs does not require a manufacturer to run the full gamut of certification for such changes. Instead, it has a rapid paper process in order to protect against spurious RF emissions.

<sup>2</sup> Cisco, Linksys, NetGear, Ambit, Ams, and Toshiba are among the manufacturers with certified DOCSIS products. CableLabs Certified® or CableLabs Qualified means that the device has passed a series of tests for compliance with a particular CableLabs specification and has thus demonstrated interoperable functionality with any other "CableLabs certified/qualified device. Many of these devices provide other functions selected by the manufacturer. CableLabs encourages such innovation. The phrase CableLabs certified/qualified does not mean that we have tested or endorsed these other features, which are solely the responsibility of the manufacturer.

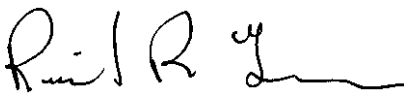
Today, the DOCSIS certification process is even more rapid. The "wave" process, in which CableLabs tests all products submitted by multiple manufacturers for interoperability, has been streamlined with the addition of quicker "mini-waves." Devices with minor changes can be re-certified in one-third the time it previously took. For even more minor changes (such as a power supply), CableLabs allows paper submissions. Also of note is the fact that the new DOCSIS 2.0 specification was issued in January 2002, and after CableLabs hosted and conducted several opportunities for multiple manufacturers to test together, the first products were certified under that specification in December 2002.

The retail availability of modems has been further enhanced through CableLabs "Go2Broadband" service locator, which was launched in 2001. Go2Broadband facilitates business agreements between cable operators and affiliates such as retailers, PC OEMs, and E-tailers for the sale of high-speed data services offered by the cable operator. It acts as a real-time messaging router, mapping an affiliate query with a matching MSO and its offers. Participation in Go2Broadband is open and free of charge to all firms that would like this information to sell modems and cable services. In 2002, Go2Broadband fielded 10.5 million such queries.

The DOCSIS certification program has been successfully incorporated into many other areas, such as PacketCable, CableHome, and Opencable. At the suggestion of consumer electronics manufacturers, the Opencable certification process also has been improved recently, independent of the MSO-CE agreement submitted to the Commission in December. The Opencable certification process includes advance coordination with a manufacturer's proposed product deployment cycle; free certification testing "dry runs;" and minor "bug fixes" of products during the testing cycle (in order to minimize unnecessary time spent waiting for the next testing wave). Where time to market is urgent, CableLabs also will expedite an appeal of a failed test within a compressed schedule. In order to accommodate the many product "tweaks" and changes that manufacturers make in television features over the course of a product's life, CableLabs allows for paper submissions for minor changes, automatic certification where only the logo or nameplate has changed, and a means for obtaining approval for reference designs from which manufacturers can build various models. In anticipation of retail offerings of POD-enabled digital televisions, Go2Broadband recently has been expanded to include high-definition (HD) service offerings, in addition to high-speed data.

In closing, I think the record quite clearly demonstrates that CableLabs has promoted entry by multiple manufacturers, increased innovation and customer choice, reduced prices, and promoted a robust retail market.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard R. Green". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard R. Green  
President and Chief Executive Officer  
Cable Television Laboratories, Inc.

cc: Commissioner Kathleen Q. Abemathy  
Commissioner Michael J. Copps  
Commissioner Kevin J. Martin  
Commissioner Jonathan S. Adelstein  
Susan Eid, Legal Advisor to Chairman Powell  
Stacy Robinson, Legal Advisor to Commissioner Abemathy  
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Linda Senecal, Media Bureau  
Susan Mort, Media Bureau  
Marlene H. Dortch, Secretary (for inclusion in GN Docket No. 00-185, CS Docket 02-52, and CS Docket No. 97-80)